

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
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PURDUE PHARMA L.P., <i>et al.</i> ,	:	Case No. 19-23649 (RDD)
	:	
Debtors. <sup>1</sup>	:	(Jointly Administered)
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**SUPPLEMENTAL DECLARATION OF MICHAEL ATKINSON IN SUPPORT  
OF APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS FOR ENTRY OF AN ORDER AUTHORIZING THE  
EMPLOYMENT AND RETENTION OF PROVINCE, INC. AS  
FINANCIAL ADVISOR NUNC PRO TUNC TO OCTOBER 1, 2019**

I, Michael Atkinson, hereby declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury as follows:

1. I am a principal of the firm of Province, Inc. (“Province”), which is a financial advisory firm with its principal office located at 2360 Corporate Circle, Suite 330, Henderson, Nevada 89074. Province also has offices in the Baltimore, Los Angeles, and Miami metro areas.

2. I am familiar with the matters set forth herein and make this supplemental declaration (the “Supplemental Declaration”) in connection with the *Application of the Official Committee of Unsecured Creditors* (the “Committee”) *for Entry of an Order Authorizing and Approving the Employment of Province, Inc. as Financial Advisor Nunc*

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Pro Tunc to October 1, 2019 [ECF No. 423] (the “Application”)<sup>2</sup> filed on November 5, 2019, and my initial declaration attached as Exhibit B to the Application (the “Initial Declaration”).

3. As set forth in the Application, which was granted by this Court on November 21, 2019 [ECF No. 524], Province committed to file a supplemental declaration pursuant to Bankruptcy Rule 2014 to the extent new information was relevant to the Application and merited disclosure. See Initial Declaration ¶ 7. Accordingly, in connection with Province’s representation of the Committee, I submit this Supplemental Declaration to provide the additional disclosure set forth herein.

#### **Specific Disclosure**

4. On October 27, 2020, the United States Trustee for Region 3 appointed an Official Committee of Opioid-Related Claimants (the “Mallinckrodt Opioid Committee”) in the chapter 11 cases of Mallinckrodt plc and its affiliated debtors (the “Mallinckrodt Debtors”), which cases are pending before the United States Bankruptcy Court for the District of Delaware. See *Notice of Appointment of Opioid Related Claimants, In re Mallinckrodt plc, et al.*, Case No. 20-12522 (JTD) (Bankr. D. Del. Oct. 27, 2020) [ECF No. 308]. The Mallinckrodt Debtors include multiple entities that were named as co-defendants with the Debtors in various prepetition lawsuits arising from the opioid crisis, and such entities may hold contingent common law contribution claims against the Debtors. In addition, the Debtors may hold contingent common law contribution claims against the Mallinckrodt Debtors.

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

5. The Mallinckrodt Opioid Committee has selected Province as its financial advisor, effective as of October 28, 2020, pending court approval. Province is currently engaged in conflict checks and anticipates filing an application to be retained by the Mallinckrodt Opioid Committee in the near future. For the avoidance of doubt, in the Debtors' chapter 11 cases, Province does not represent any Mallinckrodt Debtor. In addition, in the Debtors' chapter 11 cases, Province will abstain from being involved in any issues regarding Mallinckrodt's claims (if any) against the Debtors. In the Mallinckrodt chapter 11 cases, Province will abstain from being involved in any issues regarding the Debtors' claims (if any) against Mallinckrodt.

6. Province has discussed its representation of the Committee and the Mallinckrodt Opioid Committee with counsel to the Debtors in these cases, and counsel to the debtors in the Mallinckrodt cases.

7. I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 6, 2020

PROVINCE, INC.

/s/ Michael Atkinson  
Michael Atkinson, Principal  
Province, Inc.